

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

United States of America,

File No. 22-cr-00224-NEB-TNL-1

Plaintiff,

vs.

Qamar Ahmed Hassan,

Defendant.

**DEFENDANT QAMAR AHMED**  
**HASSAN'S UNOPPOSED MOTION**  
**TO ALLOW INTERNATIONAL**  
**TRAVEL**

Defendant Qamar Ahmed Hassan respectfully moves the Court for an order granting her permission to travel to Nairobi, Kenya, to care for and be with her 86-year-old mother, Halima Osman. Ms. Osman is scheduled to have surgery on November 4, 2024, to treat Stage 3 colon cancer. Ms. Hassan is Ms. Osman's only child, and Ms. Osman lives alone.

Ms. Hassan would be traveling alone, and would stay with family friends in an extra bedroom in their apartment. The apartment is Unit 402 in the 5<sup>th</sup> Park Heights building, PRRC+VP&, Fifth Parklands Ave, Nairobi, Kenya. Ms. Hassan's local phone number would be +254 079 777 1439, and she will have her cell phone enabled to make and receive international calls.

Ms. Osman has been ill for some time, but had resisted surgery until recently, when her condition worsened. Ms. Osman contacted Ms. Hassan on October 13 to tell her that her condition had worsened, that she had been admitted to Kenyatta National Hospital, and that her medical care team was exploring surgical options. Ms. Hassan then contacted hospital administrators and requested a confirmatory letter, a copy of which is

included here at **Exhibit A**. In the letter, Dr. John Okumu indicates that Ms. Osman is scheduled to have surgery on November 4, 2024, and confirms Ms. Osman's strong desire to have Ms. Hassan with her in Nairobi to assist with her recovery from what is hopefully a successful surgery. (**Ex. A.**)

Ms. Hassan would prefer to travel to Nairobi as soon as possible, recognizing that any departure date before November 22, 2024, would put this motion inside of the typical 30-day request period for international travel. Ms. Hassan hopes the Court will nevertheless grant this motion and approve travel as early as October 29, 2024, with a stay of approximately one month. Waiting to travel until November 22 would pose difficulties, in that they would need to find alternative post-surgical care for Ms. Osman, but if she must comply with the 30-day request period she still asks to be allowed to travel for this purpose from November 22 through December 22.

There are daily flights from Minneapolis to Nairobi, through either Amsterdam or Paris. One such itinerary, attached hereto as **Exhibit B**, would have her depart on November 5, the day after Ms. Osman's surgery, and return on December 4. This would allow her to serve as her mother's primary caretaker, providing physical and emotional support, for one month following surgery. We had hoped that the United States Attorney's Office would join this motion, but they have just indicated that while they are not joining the motion, they do not oppose this request.

Ms. Hassan has pleaded guilty in this case and is out of custody awaiting sentencing. She has been fully compliant with the terms of her pretrial supervision, and poses no danger to the community and no flight risk. She has sons living with her here,

one of whom is a minor, and a grandchild here for whom she provides regular care, as well as many family and friends. This trip would be difficult in that she has many family obligations here, but she desperately wants to be with and care for her mother, and her other family members will assist in caring for her sons if she is allowed to travel. Ms. Hassan is grateful to the Court for its consideration.

Ms. Hassan agrees to maintain contact with her counsel and to return to Minnesota not later than December 22, 2024, or as otherwise needed or ordered by the Court.

Respectfully submitted,

Dated: October 23, 2024

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